STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

The Dingley Press, Inc.
Androscoggin County
Lisbon, Maine
A-506-77-1-M

Departmental
Findings of Fact and Order
New Source Review
Amendment #1

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	The Dingley Press, Inc. (Dingley)
PART 70 LICENSE NUMBER	A-506-70-H-R/A
LICENSE TYPE	Chapter 115 Minor Revision
NAICS CODES	323110
NATURE OF BUSINESS	Commercial Lithographic Printing
FACILITY LOCATION	Lisbon, Maine
NSR AMENDMENT ISSUANCE DATE	January 4, 2010

B. Revision Description

The Dingley Press, Inc. (Dingley) operates Lithographic Printing Press #4. Emissions of VOC and HAP from Press #4 are currently controlled by the Catalytic Incinerator which has a required destruction efficiency of 95%. Dingley wishes to have the flexibility to control emissions from Press #4 by using either the Catalytic Incinerator or the facility's existing Regenerative Thermal Oxidizers (RTOs).

Dingley uses a Wolverine RTO-25,000 regenerative thermal oxidizer (RTO #1) and a TANN Corporation Model TR 2094 regenerative thermal oxidizer (RTO #2) to control VOCs from Presses #3, #5, #6, #7, and #8.

Currently emissions from Presses #3, #5, #6, #7, and #8 can be controlled by either RTO #1 or RTO #2. Each press is assigned a flow rate based on maximum operation. The presses all vent to a common header. When both RTOs are operating, there is sufficient capacity to control all presses at maximum production. In the event that one of the RTOs goes down, each RTO has programmed interlocks which prohibit presses with a combined total flow rate

greater than the RTO design maximum to operate. The interlocks shut down presses based on a preprogrammed priority system. Dingly maintains records which demonstrate which presses are in operation for all periods of time when only one RTO is operating. RTOs #1 and #2 are required to maintain a minimum destruction efficiency of 97.5%.

Dingley has proposed adding Press #4 to the list of presses that can be exhausted to the common header for RTOs #1 and #2. In addition, Dingley wishes to maintain the flexibility to exhaust Press #4 to the Catalytic Incinerator if they so choose.

C. Application Classification

The application for Dingley does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This application does seek to modify a Best Available Control Technology (BACT) analysis performed per New Source Review.

Additionally, the modification of a major source is considered a major modification based on whether or not expected emissions increases exceed the "Significant Emission Increase Levels" as given in *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). The changes associated with this modification will not result in any increase in emissions. Therefore, this amendment is determined to be a minor revision under *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005) and has been processed as such.

D. Annual Emissions

Dingley shall be restricted to the following annual emissions, based on a 12 month rolling total:

Total Licensed Annual Emission for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_x	CO	VOC	Single HAP	Total HAP
Catalytic Incinerator	0.4	0.4	0.1	9.4	2.4	--	--	--
RTO #1	1.3	1.3	1.3	13.6	17.1	--	--	--
RTO #2	0.5	0.5	0.1	12.3	5.1	--	--	--
Air Handling Units	1.3	1.3	0.1	2.6	2.2	--	--	--
Facility Wide Limit	--	--	--	--	--	94.4	9.9	24.9
Total TPY	**3.5**	**3.5**	**1.6**	**37.9**	**26.8**	**94.4**	**9.9**	**24.9**

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-506-77-1-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following NSR Conditions shall replace Conditions (15)(C), (E), and (J) of Air Emission Licenses A-506-70-H-R/A and A-506-70-K-A (as applicable) when amended and supersede all previous NSR Conditions referring to the control of Press #4:

(1) **Printing Presses**

A. Emissions from the dryers on Press #4 shall be controlled by either the catalytic incinerator or the regenerative thermal oxidizers. Dingley shall keep records of all operating hours for Press #4 and which control device was being utilized. [06-096 CMR 115, BACT]

B. The Catalytic Incinerator shall achieve no less than 95% destruction of VOCs. Compliance shall be demonstrated by stack testing by December 31, 2009 and once every two years thereafter unless the Catalytic Incinerator has operated for less than 720 hours since December 31 of the last year tested. In which case, stack testing shall be performed within 60 days of exceeding 720 hours of Catalytic Incinerator operation since December 31 of the last year tested. [06-096 CMR 115, BACT]

C. RTO #1 and RTO #2 shall each achieve no less than 97.5% destruction of VOC based on 1000 ppmv or higher VOC inlet measured as propane at actual air stream conditions. If the inlet VOC content is below 1000 ppmv, the VOC outlet shall not exceed 25 ppmv at actual stack conditions. Dingley shall demonstrate compliance with the destruction efficiency for RTO #1 and RTO #2 by stack testing each by December 31, 2009 and once every two years thereafter. After two sets of successful compliance demonstrations, Dingley may apply to reduce the frequency of stack testing required. [06-096 CMR 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 4th DAY OF January , 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/23/09
Date of application acceptance: 10/23/09

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Ross, Bureau of Air Quality.

FILED
JAN - 5 2010
BOARD OF ENVIRONMENTAL PROT.
STATE OF MAINE